

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LORD ABBETT AFFILIATED FUND, INC., *et al.*,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP, INC.

Defendant.

No. 2015-cv-00774 (LTS) (DF)

**ORAL ARGUMENT  
REQUESTED**

**NOTICE OF AIG'S MOTION FOR SUMMARY JUDGMENT ON RELIANCE**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of AIG's Motion for Summary Judgment on Reliance (the "Motion"), Statement Under Local Civil Rule 56.1 in Support of the Motion, and Declaration of Joseph S. Allerhand in Support of the Motion and exhibits attached thereto, Defendant American International Group, Inc. ("AIG") will move this Court, before the Honorable Laura T. Swain, United States District Judge, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 12D, New York, New York 10007, for an order granting summary pursuant to Federal Rule of Civil Procedure 56(a) on the issue of reliance under Section 10(b) of the Securities Exchange Act of 1934 against Plaintiffs Lord Abbett Affiliated Fund, Inc., and Lord Abbett Series Fund, Inc. - Growth and Income Portfolio, or for such other relief as this Court may deem just and proper.

In accordance with Rule A.2.B of Judge Swain's Individual Rules of Practice, the undersigned counsel certifies that AIG used its best efforts to resolve informally the matters raised in this submission. These efforts were unsuccessful.

Dated: New York, New York  
January 17, 2017

Respectfully submitted,

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By: /s/ Joseph S. Allerhand

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